

THE HONORABLE BARBARA J. ROTHSTEIN

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JENNIFER MILLER, CHRISTOPHER CAIN,
JOSE GRINAN, KIMBERLY HALO, KELLY
KIMMEY, JUMA LAWSON, SHARON
PASCHAL, and PHILIP SULLIVAN, on behalf
of themselves and all others similarly situated,

Plaintiff,

v.

AMAZON.COM, INC., and AMAZON
LOGISTICS, INC.,

Defendants,

Case No. 2:21-cv-00204-BJR

**SECOND STIPULATED MOTION TO
EXTEND DEFENDANTS' DEADLINE
TO RESPOND TO THE PENDING
MOTION TO SEAL**

Plaintiffs and Defendants, Amazon.com, Inc., and Amazon Logistics, Inc., (together the "Parties"), stipulate and hereby jointly request that the Court enter a second order extending Defendants' deadline to respond to Plaintiffs' Motion to Seal Confidential Documents in Support of Their Motion for Class Certification (Dkt. No. 108) (the "Motion to Seal") by a further two-weeks, from the current deadline of February 25, 2025 to March 11, 2025.

1. On January 21, 2025, Plaintiffs filed the Motion to Seal regarding documents Plaintiffs have provisionally lodged under seal in support of their pending Motion to Certify a

1 Class (Dkt. No. 110). The documents filed provisionally under seal are all documents which
2 Defendants have designated confidential pursuant to the Protective Order in this case. *See* Dkt.
3 No. 95. While Defendants had previously agreed to de-designate certain documents as confidential
4 in a meet and confer with Plaintiffs, the document subject to the Motion to Seal are documents
5 Defendants believe warrant protection from public filing.

6 2. Pursuant to Local Civil Rule 5(g)(3)(B), Amazon intends to file a “specific
7 statement of the applicable legal standard and the reasons for keeping [the Confidential Exhibits]
8 under seal,” including the specific explanations, in its responsive brief to the Motion to Seal.

9 3. The Parties previously stipulated to extend Amazon’s deadline to respond to the
10 Motion to Seal to February 25, 2025, which this Court approved. *See* Dkt. Nos. 113 & 114.
11 However, Amazon requires additional time to gather the declarations and material to support its
12 forthcoming request to retain the exhibits (Dkt. No. 109) under seal, and accordingly has
13 requested—and Plaintiffs have agreed—to extend the deadline for Amazon to file its responding
14 brief by two additional weeks, to March 11, 2025.

15 4. An additional two-week extension for Amazon to file its response will not delay
16 any deadlines in this case. Defendants’ response to Plaintiffs’ Motion to Certify a Class is not due
17 until April 14, 2025, and that motion will not be fully briefed until April 28, 2025 (Dkt. No. 86).
18 Accordingly, a brief additional two-week extension to file a response in support of the Motion to
19 Seal will not delay adjudication of the underlying motion, affect future briefing on class
20 certification, or otherwise delay litigation of this case.

1 THEREFORE, the Parties respectfully request that the Court enter an order extending
2 Defendants' deadline to file a response in support of the pending Motion to Seal to **March 11,**
3 **2025.**

4 IT IS SO STIPULATED.

5 DATED this 21st day of February, 2025.
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

**TERRELL MARSHALL LAW GROUP
PLLC**

By: s/ Beth E. Terrell

Beth E. Terrell, WSBA #26759

Email: bterrell@terrellmarshall.com

Toby J. Marshall, WSBA #32726

Email: tmarshall@terrellmarshall.com

Jennifer Rust Murray, WSBA #36983

Email: jmurrary@terrellmarshall.com

TERRELL MARSHALL LAW GROUP PLLC

936 North 34th Street, Suite 300

Seattle, Washington 98103

Telephone: (206) 816-6603

Facsimile: (206) 319-5450

Hillary Schwab, Admitted *Pro Hac Vice*

Email: hillary@fairworklaw.com

Brant Casavant, Admitted *Pro Hac Vice*

Email: brant@fairworklaw.com

FAIR WORK, P.C.

192 South Street, Suite 450

Boston, Massachusetts 02111

Telephone: (617) 607-3260

Facsimile: (617) 488-2261

Andrew R. Frisch, Admitted *Pro Hac Vice*

Email: AFrisch@forthepeople.com

Paul M. Botros, Admitted *Pro Hac Vice*

Email: pbotros@forthepeople.com

MORGAN & MORGAN, P.C.

8151 Peters Road, Suite 4000

Plantation, Florida 33324

Telephone: (954) WORKERS

Attorneys for Plaintiffs

MORGAN, LEWIS & BOCKIUS LLP

By: s/ Andrew DeCarlow

Andrew DeCarlow, WSBA No. 54471

Email: andrew.decarlow@morganlewis.com

MORGAN, LEWIS & BOCKIUS LLP

1301 Second Avenue, Suite 3000

Seattle, WA 98101

Phone: (206) 274-6400

Walter F. Brown (*Pro Hac Vice*)

Email: wbrown@paulweiss.com

Shawn M. Estrada (*Pro Hac Vice*)

Email: sestrada@paulweiss.com

Marco A. Torres (*Pro Hac Vice*)

Email: mtorres@paulweiss.com

PAUL, WEISS, RIFKIND, WHARTON

& GARRISON LLP

535 Mission Street, 24th Floor

San Francisco, CA 94105

Telephone: (628) 432-5100

Facsimile: (628) 232-3101

Amy L. Barton (*Pro Hac Vice*)

Email: abarton@paulweiss.com

Matthew P. Merlo (*Pro Hac Vice*)

Email: mmerlo@paulweiss.com

PAUL, WEISS, RIFKIND, WHARTON

& GARRISON LLP

1285 Avenue of the Americas

New York, NY 10019-6064

Telephone: (212) 373-3000

Facsimile: (212) 757- 3990

*Attorney for Defendant Amazon.com, Inc. and
Amazon Logistics, Inc.*

1 **ORDER**

2 The foregoing Stipulated Motion is GRANTED. Defendants shall respond to the
3 Unopposed Motion to Seal Confidential Documents in Support of Their Motion for Class
4 Certification (Dkt. No. 108) on or before March 11, 2025.

5 IT IS SO ORDERED.

6
7 DATED this 24th day of February, 2025.

8
9 
10 THE HONORABLE BARBARA J. ROTHSTEIN
11 UNITED STATES DISTRICT JUDGE
12
13
14
15
16
17
18
19
20
21
22

1 *Presented by:*

2 **TERRELL MARSHALL LAW GROUP**
3 **PLLC**

4 By: *s/ Beth E. Terrell*

Beth E. Terrell, WSBA #26759

Email: bterrell@terrellmarshall.com

5 Toby J. Marshall, WSBA #32726

Email: tmarshall@terrellmarshall.com

6 Jennifer Rust Murray, WSBA #36983

Email: jmurray@terrellmarshall.com

7 **TERRELL MARSHALL LAW GROUP PLLC**

936 North 34th Street, Suite 300

8 Seattle, Washington 98103

Telephone: (206) 816-6603

9 Facsimile: (206) 319-5450

10 Hillary Schwab, Admitted *Pro Hac Vice*

Email: hillary@fairworklaw.com

11 Brant Casavant, Admitted *Pro Hac Vice*

Email: brant@fairworklaw.com

12 **FAIR WORK, P.C.**

192 South Street, Suite 450

13 Boston, Massachusetts 02111

Telephone: (617) 607-3260

14 Facsimile: (617) 488-2261

15 Andrew R. Frisch, Admitted *Pro Hac Vice*

Email: AFrisch@forthepeople.com

16 Paul M. Botros, Admitted *Pro Hac Vice*

Email: pbotros@forthepeople.com

17 **MORGAN & MORGAN, P.C.**

8151 Peters Road, Suite 4000

18 Plantation, Florida 33324

Telephone: (954) WORKERS

19 *Attorneys for Plaintiffs*

20

21 *Attorney for Defendant Amazon.com, Inc. and*
22 *Amazon Logistics, Inc.*

23 SECOND STIPULATED MOTION TO EXTEND
24 DEFENDANTS' DEADLINE TO RESPOND TO THE
PENDING MOTION TO SEAL – PAGE 6
Case No. 2:21-cv-00204-BJR

MORGAN, LEWIS & BOCKIUS LLP

By: *s/ Andrew DeCarlow*

Andrew DeCarlow, WSBA No. 54471

Email: andrew.decarlow@morganlewis.com

MORGAN, LEWIS & BOCKIUS LLP

1301 Second Avenue, Suite 3000

Seattle, WA 98101

Phone: (206) 274-6400

Walter F. Brown (*Pro Hac Vice*)

Email: wbrown@paulweiss.com

Shawn M. Estrada (*Pro Hac Vice*)

Email: sestrada@paulweiss.com

Marco A. Torres (*Pro Hac Vice*)

Email: mtorres@paulweiss.com

PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP

535 Mission Street, 24th Floor

San Francisco, CA 94105

Telephone: (628) 432-5100

Facsimile: (628) 232-3101

Amy L. Barton (*Pro Hac Vice*)

Email: abarton@paulweiss.com

Matthew P. Merlo (*Pro Hac Vice*)

Email: mmerlo@paulweiss.com

PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP

1285 Avenue of the Americas

New York, NY 10019-6064

Telephone: (212) 373-3000

Facsimile: (212) 757- 3990

MORGAN, LEWIS & BOCKIUS LLP

ATTORNEYS AT LAW

1301 SECOND AVENUE, SUITE 3000

SEATTLE, WASHINGTON 98101

TEL +1.206.274.6400 FAX +1.206.274.6401